BEFORE THE

POSTAL RATE COMMISSION 19 5 06 PH 197

WASHINGTON, D.C. 20268-0001

POSTAL RATE COMMISSION
POSTAL RATE

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

REVISED RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS PATELUNAS TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

(OCA/USPS-T15-2)

The United States Postal Service hereby provides the revised response of witness Patelunas to the following interrogatory of the Office of the Consumer Advocate: OCA/USPS-T15-2, filed on August 18, 1997. The original response was filed on September 2, 1997.

The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Susan M. Duchek

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–2990; Fax –5402 September 19, 1997

Response of United States Postal Service Witness Patelunas to Interrogatories of Office of the Consumer Advocate

Revised 9/19/97

OCA/USPS-T-15-2. Please refer to your response to OCA/USPS-T24-25 (redirected to you), and page 20, line 7 of USPS-T-24.

- a. Please confirm that the difference between the figure of \$104,575,000 for "All Other" costs in column [2] of the table in OCA/USPS-T24-25 and the figure of \$104,580,000 for "All Other" costs in USPS-T-24 is due to rounding. If you do not confirm, please explain.
- b. Please specify which of the two "All Other" cost figures \$104,575,000 or \$104,580,000 -- is the correct amount.
- c. If, in response to part b. above, you chose the figure, \$104,580,000, please provide the correct figure(s) for each Cost Segment in column [2] of the table in OCA/USPS-T24-25.

OCA/USPS-T-15-2 Response:

- a. I cannot say why USPS-T-24 is different, it may be due to rounding. Whatever the reason, \$5,000 out of more than \$104 million is insignificant.
- b. See my response to OCA/USPS-T24-25 (revised 9/19/97). The correct amount is \$104,579.
- c. See Attachment I to my response to OCA/USPS-T24-25 (revised 9/19/97).

DECLARATION

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I, Richard Patelunas, declare under penalty of perjury that the foregoing answers to interrogatories are true and correct to the best of my knowledge, information, and belief.

Dated: 9/19/97

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Susan M. Duchek

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